

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRISTAN SIMPSON BRENNAND and
BODEN GREGORY BRIDGE,

Defendant.

NO. CR15-384RSL

**STIPULATED MOTION
TO CONTINUE TRIAL**

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Thomas M. Woods, Assistant United States Attorney for said District, Defendant, Tristan Brennand, by and through his counsel, Robert Flenbaugh, and Defendant, Boden Bridge, by and through his counsel, John Kannin, hereby move the Court to continue the trial until a date in June 2016.

Trial in this case is scheduled for February 8, 2016, which is the first trial date in this matter. The discovery in this case is substantial. The government produced in electronic format the discovery, which consists of over 5700 separate documents (not pages). The discovery includes imaging of multiple electronic devices, where much of the key evidence was located. The discovery also includes multiple audio and video files. In addition, search warrants were executed at four separate physical locations, resulting in the seizure of various items.

1 In light of this volume of discovery, it is not practical for the defense, even with
2 the exercise of due diligence, to review all of the material within the timeframe of the
3 Speedy Trial Act, let alone adequately analyze whether any pretrial motions should be
4 filed or prepare for trial.

5 In light of these circumstances, the parties submit that the failure to grant a
6 continuance would deny counsel the reasonable time necessary for effective preparation,
7 taking into account the exercise of due diligence, within the meaning of 18 U.S.C. §
8 3161(h)(7)(B)(iv). The parties also believe that the failure to grant a continuance of the
9 trial date would result in a miscarriage of justice, 18 U.S.C. § 3161(h)(7)(B)(i). Finally,
10 the parties believe that the ends of justice will be served by ordering a continuance in this
11 case, that a continuance is necessary to ensure adequate time for effective case
12 preparation, and that these factors outweigh the best interests of the public and the
13 Defendant in a speedy trial.

14 Counsel for the defendants will be filing Speedy Trial waivers with the Court.

15 Accordingly, the parties request that the Court continue the case until a date in
16 June 2016.

17 DATED this 20th day of January, 2016.

18 Respectfully submitted,

19 ANNETTE L. HAYES
20 United States Attorney

21 /s/ Thomas M. Woods

22 THOMAS M. WOODS
23 Assistant United States Attorney

24 /s/ Robert Flennaugh

25 ROBERT FLENNAUGH
26 Counsel for Tristan Brennand

27 /s/ John Kannin

28 JOHN KANNIN
Counsel for Boden Bridge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s). I hereby certify that I have served the attorney(s) of record for the defendant(s) that are non CM/ECF participants via telefax.

/s/ Salee Porter
SALEE PORTER
Paralegal
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, WA 98101
Phone: (206) 553-4345
Fax: (206) 553-4440
E-mail: Salee.Porter@usdoj.gov